IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LISA LAMBERT

Plaintiff,

vs.

CIVIL ACTION NO.. 96-247

SUPERINTENDENT WOLFE,
et al.,

Defendants.

PLAINTIFF LAMBERT'S MOTION TO REOPEN CASE

AND NOW comes Plaintiff Lisa Lambert through her attorneys Angus Love and Jere Krakoff who move this Honorable Court to reopen her case for the following reasons.

- 1. Plaintiff Lambert refused to release her psychiatric records due to pending post-conviction criminal proceedings.
 - 2. Said criminal proceedings have been concluded.
- 3. Per this Court's Order of July 14, 2000, this case will be reopened upon the filing of a Motion requesting such by either party.
 - 4, Accordingly, Plaintiff Lambert is prepared to resume this case.

For these reasons, Plaintiff Lambert respectfully requests that the case be reopened.

Respectfully submitted,

Pennsylvania Institutional Law Project

By: <u>s/Angus Love</u> Angus Love, I.D. #22392 Jere Krakoff, I.D. #

> 924 Cherry St., Ste. 523 Philadelphia, PA 19107 (215) 925-2966 (Telephone) (215) 925-5337 (Facsimile) Attorneys for Plaintiff

Date: January 25, 2006

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of January, 2006, Plaintiff's Motion to Reopen Case was served via U. S. Mail, first class, postage paid on counsel for Defendants as follows:

> Thomas Halloran, Esquire Office of Attorney General 564 Forbes Avenue 6th Floor, Manor Complex Pittsburgh, PA 15219

Kemal Alexander Merricli, Esquire Senior Deputy Attorney General Office of Attorney General – Western Region 6th Floor Manor Complex 564 Forbes Avenue Pittsburgh, PA 15219

> s/Angus Love ANGUS R. LOVE

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LISA LAMBERT	: :
Plaintiff,	
VS.	: CIVIL ACTION NO 96-247
SUPERINTENDENT WOLFE, et al.,	
Defendants.	
	ORDER
AND NOW, this da	ay of January, 2006, Plaintiff's Motion to Reopen
the Case is HEREBY GRANTED) .
	BY THE COURT: